

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MEMBERSELECT INSURANCE  
COMPANY, a/s/o CHRIS AND RENATA  
LOIOTILE,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS, INC., a  
Delaware corporation, SEARS HOLDING  
CORPORATION, a Delaware corporation,

Defendants.

Case No. 1:13-CV-4097

**JOINT MOTION FOR AGREED PROTECTIVE ORDER**

NOW COME Plaintiff MEMBERSELECT INSURANCE COMPANY, a/s/o CHRIS AND RENATA LOIOTILE, and Defendants ELECTROLUX HOME PRODUCTS, INC., and SEARS HOLDING CORPORATION, all of which jointly move this Honorable Court to enter a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure regarding documents and other material to be produced by the Parties in this matter. In support of this motion, Plaintiff and Defendants state as follows:

1. All Parties agree that in litigating this case certain information and documents may be sought and disclosed, which may include confidential, competitively sensitive and proprietary information.
2. All Parties agree that good cause exists for the entry of a protective order based on the nature of the documents and information that may be produced in this case.
3. To control the disclosure of this confidential information, the Parties have agreed to the terms of the proposed Agreed Protective Order, based upon the Northern District's model order.

4. The proposed Order is forward concurrently with this Motion to Judge Aspen's proposed order e-mail box. Per the local rule, the forwarded draft Order includes a redline and clean version reflecting the parties' proposed edits.

WHEREFORE, Plaintiff MEMBERSELECT INSURANCE COMPANY, a/s/o CHRIS AND RENATA LOIOTILE, and Defendants ELECTROLUX HOME PRODUCTS, INC., and SEARS HOLDING CORPORATION, respectfully request that this Honorable Court enter the Agreed Protective Order proposed by the Parties.

**Dated: October 16, 2014**

**Respectfully submitted,**

By: /s/ Ethan E. White  
Michael I. Leonard  
Ethan E. White  
LEONARD LAW OFFICES  
203 North LaSalle, Suite 1620  
Chicago, Illinois 60606  
(312) 380-6559  
mleonard@leonardlawoffices.com  
ewhite@leonardlawoffices.com

*Counsel for Electrolux Home Products,  
Inc.*

By: /s/ Jennifer H. Tedesco  
Jennifer H. Tedesco  
Gibson & Sharps  
1443 20th Street, Suite F  
Vero Beach, Florida 32960  
1-800-759-0964  
jht@gibsonsharps.com  
*Counsel for Plaintiff*

By: /s/ Heather Keil  
Heather L. Keil  
O'HAGAN LLC  
1 East Wacker Drive, Suite 3400  
Chicago, Illinois 60601  
(312) 4226143  
hkeil@ohaganlaw.com

*Counsel for Sears Holding Corp.*